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## Introduction

This Engineering Evaluation/Cost Analysis (EE/CA) for the waste shale and former impoundments of the Anvil Points Facility (APF) was prepared for the U.S. Department of Interior, Bureau of Land Management (BLM), Colorado State Office in Denver, Colorado. The EE/CA was prepared by Ecology and Environment (E&E) under BLM Contract No. NAB03000102. The EE/CA is part of a program that also includes a Preliminary Assessment (PA) and Site Investigation (SI) activities at the APF. The scope of the PA, SI, and EE/CA activities at the site are presented in the Final Work Plan for EE/CA of Spent Shale Pile, and PA/SI of Portions of the Anvil Points Facility, at the Former Naval Oil Shale Reserve #3, Colorado (prepared for the BLM, December 16, 2003).

This EE/CA has been prepared in accordance with the criteria established under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sections of the National Contingency Plan (NCP) applicable to removal actions (40 CFR § 300.415 (b)(4)(I)). The EE/CA is also consistent with the U.S. Environmental Protection Agency (EPA) guidance document, *Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA*.

The objectives of the EE/CA are to:

- Present a complete description of the site and chemicals of concern for the waste shale pile and former impoundments;
- Conduct streamlined risk evaluations to determine the potential threats to human health and the environment posed by the waste shale pile and former impoundments and document the need for a removal action to address the contamination;
- Present reasonable removal action alternatives and the rationale for a comparative evaluation of the alternatives;
- Recommend the removal action which most completely addresses the potential threat posed by the contamination within the waste shale pile and former impoundments;
- Satisfy the requirements for documentation of removal action selection including use of the EE/CA for public comment; and

- Satisfy land use plan conformance and the requirements of the National Environmental Policy Act of 1969 (NEPA) for the recommended removal action.

The Council on Environmental Quality (CEQ) has stressed that federal agencies should integrate NEPA values into the CERCLA process when feasible and appropriate. This is done by fully addressing NEPA critical elements and NEPA values (e.g., analysis of cumulative, offsite, ecological, and socioeconomic impacts) to the extent practical in the EE/CA. Section 9.3 provides a summary of the critical and non-critical elements of NEPA. Appendix E provides a detailed examination of the information provided in the EE/CA that addresses the NEPA elements.